STATEMENT OF BASIS (AI No. 4885)

for draft Louisiana Pollutant Discharge Elimination System permit No. **LA0075833** to discharge to waters of the State of Louisiana.

THE APPLICANT IS: International Matex Tank Terminals
IMTT- St. Rose
Post Office Box 159
St. Rose, LA 70087

ISSUING OFFICE: Louisiana Department of Environmental Quality (LDEQ)
Office of Environmental Services
Post Office Box 4313
Baton Rouge, Louisiana 70821-4313

PREPARED BY: Lisa Kemp

DATE PREPARED: September 23, 2009

1. PERMIT STATUS

A. Reason For Permit Action:

Permit reissuance of a Louisiana Pollutant Discharge Elimination System (LPDES) permit for a 5-year term

B. LPDES permits – LA0075833
LPDES permit effective date: December 1, 2004
LPDES permit expiration date: November 30, 2009
Modification date: November 1, 2008
EPA has not retained enforcement authority.

LAG670118*
LPDES permit effective date: September 22, 2009
LPDES permit expiration date: January 31, 2013

* This general permit coverage is for hydrostatic test waters from new bulk storage tanks located in an area not currently covered by the facility's LPDES permit. Hydrostatic test wastewaters from this area will be incorporated into LPDES permit LA0075833 upon renewal.

C. Date Application Received: July 22, 2009; application addendums were received on September 8, 2009 and October 9, 2009.

2. FACILITY INFORMATION

A. FACILITY TYPE/ACTIVITY - bulk liquid storage and transfer terminal

International Matex Terminals (IMTT) – St. Rose facility is a private, for hire bulk liquid storage and transfer terminal. Liquid bulk materials include vegetable oils, natural oils, animal fats, petroleum products including fuel oils, diesel oil, lubricating oil, AGO/VGO, gasoline, cutter stocks, asphalt and asphalt blends, crude oil, heavy olefins, light olefins, heavy gas oil, light gas oil, condensate, carbon black, kerosene, naptha, pyrolysis gas oil, quench oil, ethanolamines, alcohols including denatured

alcohol, ethanol, and methyl alcohol, therminol, SAS-60 (detergent), glycerin, creosote, glycols, mineral oil, sulfuric acid, and caustic soda. The terminal's bulk liquid storage capacity is approximately 15,000,000 bbls. Materials are transferred via railcars, tank trucks, barges, and ships.

Process wastewaters including tank and equipment washwater, tank and pipeline hydrotesting, contact stormwater from inside diked areas, pits, docks, and truck and rail racks, vapor recovery condensate from methanol loading, treated scrubber water from the vapor recovery unit, incidental spills and leaks, and petroleum contaminated groundwater are discharged through Outfall 006. Wastewaters discharged through other outfalls include boiler blowdown and condensate, tank and pipeline hydrostatic test water, exterior vehicle washwater, treated sanitary wastewater, and irrigation/washdown water from St. Rose Nursery greenhouse.

The facility also accepts process wastewaters from the IMTT Gretna facility and the IMTT Avondale facility. The IMTT Gretna and Avondale facilities are existing private, for hire, bulk liquid storage and transfer facilities. IMTT Gretna and IMTT Avondale handle the same products as the St. Rose facility.

The wastewaters from Gretna and Avondale include interior and exterior tank washwaters, equipment washwaters, hydrostatic test water, contact stormwater from pits, docks, and truck and rail tracks, vapor recovery condensate from methanol loading, and incidental spills, leaks, and petroleum contaminated groundwater. The wastewater is trucked in and discharged for treatment through Outfall 006.

Previously monitored wastewaters from the Renewable Energy Group (REG) facility are discharged through Outfall 003. The IMTT St. Rose facility has leased a portion of its property to REG for operation of a biodiesel plant. The wastewaters from the REG facility include stormwater runoff, boiler blowdown, cooling tower blowdown, and water softener regeneration waters. All discharges from REG will be monitored as required by their LPDES permit LA0123960 prior to discharge through IMTT Outfall 003.

A new outfall has been added to the permit to drain an area of new tankage that is currently under construction.

This facility is not subject to Effluent Limitations Guidelines for Transportation Equipment Cleaning, 40 CFR Part 442, because, in accordance with 40 CFR 442.1.a, "this part applies to discharges resulting from cleaning the interior of tanks used to transport chemical, petroleum or food grade cargos" and 40 CFR 442.1.b, "This part is not applicable to... wastewaters resulting from cleaning the interiors of drums, intermediate bulk containers, or closed top hoppers." This facility does not clean tanks used to transport cargo.

B. FEE RATE
1. Fee Rating Facility Type: minor
2. Complexity Type: II
3. Wastewater Type: III
4. SIC code: 4226, 5171

C. LOCATION - 11842 River Road, in St. Rose, St. Charles Parish
Latitude 29° 56' 19", Longitude 90° 19' 41"

3. OUTFALL INFORMATION

Outfall 002

Discharge Type:	stormwater runoff from inside dikes of N-series tanks and from maintenance areas, irrigation water from St. Rose Nursery green house washdown*, and previously monitored hydrostatic test water
Treatment:	none
Location:	at the point of discharge from the pump station north of the North Territory drainage pit, prior to combining with other waters
Flow:	intermittent
Discharge Route:	Lake Pontchartrain via LaBranche wetlands

Outfall 003

Discharge Type:	stormwater runoff from inside the dikes of the eastern tank farm, truck/rail loading and unloading areas, and from maintenance areas, boiler blowdown, condensate, exterior vehicle washwater, treated sanitary wastewater, previously monitored hydrostatic test water, and previously monitored REG facility wastewaters (stormwater runoff, boiler blowdown, cooling tower blowdown, and water softener regeneration waters)
Treatment:	oil/water separator; sanitary wastewater is treated through mechanical treatment plants (7 units with total design flow of 4500 gpd)
Location:	at the point of discharge north of the east/west access road and east of the north/south access road, prior to combining with other waters
Flow:	intermittent
Discharge Route:	Lake Pontchartrain via LaBranche wetlands

Outfall 004

Discharge Type:	stormwater runoff from inside dikes of the central tank farm and from maintenance areas, irrigation water from St. Rose Nursery green house washdown*, and previously monitored hydrostatic test water
Treatment:	none
Location:	at the point of discharge from the pump station north of railroad tracks and south of N-series of tanks, prior to combining with other waters
Flow:	intermittent
Discharge Route:	Lake Pontchartrain via LaBranche wetlands

Outfall 005

Discharge Type:	stormwater runoff from inside dikes of the southern tank farm, inside dikes of the methanol tanks west of Airline Street, and from maintenance areas, treated sanitary wastewater, and previously monitored hydrostatic test water
Treatment:	sanitary wastewater is treated through mechanical treatment plants (design capacity 500 gpd)
Location:	at the point of discharge west of 90 series access drive on Airline Street, prior to combining with other waters

Flow:	intermittent
Discharge Route:	Lake Pontchartrain via LaBranche wetlands

Outfall 006

Discharge Type:	treated process wastewaters including tank and equipment washwater, contact stormwater from inside dikes, pits, docks, and truck and rail racks, vapor recovery condensate from methanol loading, scrubber water from vapor recovery unit, incidental spills and leaks, petroleum contaminated groundwater, and hydrostatic test water (from this location and from the IMTT Gretna and Avondale facilities)
Treatment:	dissolved air flotation, equalization, biological reactor, and sludge digester
Location:	at the point of discharge from the tank EF-1 sample valve prior to combining with other waters
Flow:	0.048 MGD (maximum 30-day flow)
Discharge Route:	via pipe to the Mississippi River

Outfall 007

Discharge Type:	hydrostatic test water
Treatment:	none
Location:	at the point of discharge from the pipe or tank being tested, prior to combining with other waters
Flow:	intermittent
Discharge Route:	Lake Pontchartrain via LaBranche wetlands

Outfall 008

Discharge Type:	stormwater runoff from inside the dikes of the western tank farm, the pipe laydown area, from maintenance areas, and previously monitored hydrostatic test water
Treatment:	none
Location:	at the point of discharge from the end of the ditch located on the western edge of the facility, south of the railroad tracks, prior to combining with other waters
Flow:	intermittent
Discharge Route:	Lake Pontchartrain via LaBranche wetlands

Outfall 009

Discharge Type:	stormwater runoff from inside dikes of the far western tank farm and previously monitored hydrostatic test water
Treatment:	none
Location:	at the point of discharge from the containment area for the far western tank farm, prior to combining with other waters
Flow:	intermittent
Discharge Route:	Lake Pontchartrain via LaBranche wetlands

* According to the April, 2004 Statement of Basis for LPDES permit LA0075833, the St. Rose Nursery is a wholesale plant nursery adjacent to IMTT's St. Rose tank terminal. The St. Rose Nursery periodically washes concrete flooring and benches to remove foliage, soil, and other debris. The washdown water may contain low concentrations of nutrients, and insignificant amounts of pesticides. Due to the nutrient content, it is beneficial to apply the water to grassy areas within the St. Rose tank terminal, thereby, improving soil and plant resources. In land applying the washdown water from the St. Rose nursery, there is potential for runoff to discharge into the stormwater outfalls, Outfalls 002 and 004.

4. RECEIVING WATERS

STREAM - Mississippi River (Outfall 006)

BASIN AND SEGMENT – Mississippi River, Segment 070301

DESIGNATED USES - a. primary contact recreation
b. secondary contact recreation
c. propagation of fish and wildlife
d. drinking water supply

STREAM - Lake Pontchartrain via LaBranche wetlands (Outfalls 002, 003, 004, 005, 007, 008, and 009)

BASIN AND SEGMENT - Lake Pontchartrain Basin, Segment 041001*

DESIGNATED USES - a. primary contact recreation
b. secondary contact recreation
c. propagation of fish and wildlife

* BASIN AND SEGMENT – The facility is physically located in subsegment 041201 of the Lake Pontchartrain Basin defined at LAC 33:IX.1123.Table 3 as Bayou LaBranche – from headwaters to Lake Pontchartrain. However, a review of the USGS Quad Maps shows that the discharges from the IMTT/St. Rose facility do not flow into this defined waterbody, rather to the LaBranche wetlands, then to a pipeline canal, then to Lake Pontchartrain, subsegment 041001, defined at LAC 33:IX.1123.Table 3 as Lake Pontchartrain – West of the US-11 bridge. Therefore, for purposes of issuing this permit, subsegment 041001 will be used in the development of requirements.

5. TMDL STATUS

Subsegment 041001, Lake Pontchartrain - West of the US-11 bridge (Estuarine), is listed on LDEQ's Final 2006 303(d) List as impaired for pathogen indicators (impairment for south shore beaches only) due to sanitary overflows. To date no TMDLs have been completed for this waterbody. A reopener clause will be established in the permit to allow for the requirement of more stringent effluent limitations and requirements as imposed by a TMDL. Until completion of TMDLs for the Lake Pontchartrain Basin, those suspected causes for impairment which are not directly attributed to the bulk liquid storage and transfer terminal point source category have been eliminated in the formulation of effluent limitations and other requirements of this permit. Additionally, suspected causes of impairment which could be attributed to pollutants which were not determined to be discharged at a level which would

cause, have the reasonable potential to cause or contribute to an excursion above any present state water quality standard were also eliminated.

The IMTT St. Rose facility does not discharge directly to the south shore beaches. This Office does not anticipate the discharge of pathogen indicators at levels that would cause further impairment of the receiving waterbody.

Subsegment 070301, Mississippi River – from Monte Sano Bayou to Head of Passes, is not listed on LDEQ's Final 2006 303(d) List as impaired, and to date no TMDL's have been established. A reopener clause will be established in the permit to allow for the requirement of more stringent effluent limitations and requirements as imposed by any future TMDLs.

6. CHANGES FROM PREVIOUS PERMIT

1. Outfall 006 – scrubber water from the vapor recovery unit is now included in the discharges from Outfall 006.

2. Outfall 009 has been added for discharges from the new tank farm.

3. Because discharges from this facility flow into a drinking water protection area, language has been added to Part II of the permit requiring the permittee to contact the nearby drinking water treatment facility in the event of any unauthorized discharge into the Mississippi River.

4. The previous permit listed Outfalls 002, 003, 004, 005, 007, and 008 as discharging to subsegment 041201 of the Lake Pontchartrain Basin. The facility is located in subsegment 041201; however, the discharges are to subsegment 041001. See Section 4, Receiving Waters.

7. COMPLIANCE HISTORY/COMMENTS

A. OEC – There are no open, appealed, or pending OEC enforcement actions as of September 10, 2009.

Spill Reports:

1. October 1, 2008 – 5 liters of corn oil spilled on Dock #2 because the tankerman did not properly monitor the line to the ship. The majority of the material was recovered.
2. July 29, 2008- 15-20 bbls of Vacuum Gas Oil (VGO) due to pipeline failure. All material was recovered.
3. This Office received a letter on July 24, 2008 notifying us of a spill that occurred on July 13, 2008 of approximately 30 – 40 barrels of fuel oil. The pump was immediately stopped and the spill contained. Oil Mop cleaned up the area using a vacuum truck, heavy equipment, and hand tools. According to the LDEQ investigation report, no offsite impact occurred.
4. This Office received a letter on June 9, 2008 notifying us of a spill that occurred on June 4, 2008. Approximately ½ barrel of soy biodiesel spilled into the Mississippi River.
5. On April 9, 2008, approximately 3-5 gallons of fuel oil spilled into the Mississippi River. The fuel oil was not recoverable.

6. On January 1, 2008, approximately 20 gallons of crude oil spilled due to a leak in a pipeline. The spill was contained on site. The material was removed and placed in drums for disposal.
7. On October 1, 2007, less than 10 gallons of Vacuum Gas Oil (VGO) sprayed into the River. The spill was caused by improper tightening of line and improper sequence of line opening. Booms and pads were used to contain the sheen.
8. On September 15, 2007, approximately 2 gallons of diesel leaked into the river due to a gasket leak. The diesel was sucked up by a vacuum truck and placed into frac tanks to be recycled.
9. August 8, 2007 – Holes discovered in tank floor of SR-201 – crude oil. Waldemar Nelson contracted to develop a work plan for investigation.
10. On June 18, 2007, approximately 500 bbls of diesel was spilled due to gasket failure on a pipeline during transfer from a shore tank to the dock. The spill was contained on site. The diesel was sucked up by vacuum truck and placed into frac tanks to be recycled.

B. DMR Review/Excursions – DMRs were reviewed for the period March, 2007 through March, 2009. The following excursions were noted:

Date	Parameter	Outfall	Reported Value	Permit Limits
May, 2008	COD	003	127 mg/l	125 mg/l
Oct., 2007	No sample taken	004		
March, 2007	No sample taken	002, 003, 004		

C. Inspections – There are no recent compliance inspections on file. The most recent inspection was an investigation performed on July 15, 2008 of a spill cleanup of approximately 30-40 barrels of Heavy Fuel Oil that was released onto the ground. The report states that the spill was contained on site with no off site impact. The spill was caused by a bleeder valve being left open. The area was cleaned up using a vacuum truck, heavy equipment, and hand tools. The clean up was completed by the contractor on July 18, 2008.

8. EXISTING EFFLUENT LIMITS

Outfall 002 - stormwater runoff from inside dikes of N-series tanks and from maintenance areas, irrigation water from St. Rose Nursery green house washdown*, and previously monitored hydrostatic test water

Outfall 004 - stormwater runoff from inside dikes of the central tank farm and from maintenance areas, irrigation water from St. Rose Nursery green house washdown*, and previously monitored hydrostatic test water

Outfall 005 - stormwater runoff from inside dikes of the southern tank farm, inside dikes of the methanol tanks west of Airline Street, and from maintenance areas, treated sanitary wastewater, and previously monitored hydrostatic test water

Outfall 008 - stormwater runoff from inside the dikes of the western tank farm, the pipe laydown area, from maintenance areas, and previously monitored hydrostatic test water

Pollutant	Limitation		Frequency
	Monthly Avg	Daily Max	
	Mg/L (unless stated)		
Flow	Report	Report	1/month
TOC	---	50	1/month
Oil and Grease	---	15	1/month
Benzene (*)	---	0.1	1/month
Ethylbenzene (*)	---	0.1	1/month
Toluene (*)	---	0.1	1/month
Total Xylenes (*)	---	0.1	1/month
pH, standard units	6.0	9.0	1/month

(*) Only those which might be present.

Outfall 003 - stormwater runoff from inside the dikes of the eastern tank farm, truck/rail loading and unloading areas, and from maintenance areas, boiler blowdown, condensate, exterior vehicle washwater, treated sanitary wastewater, previously monitored hydrostatic test water, and previously monitored REG facility wastewaters (stormwater runoff, boiler blowdown, cooling tower blowdown, and water softener regeneration waters)

Pollutant	Limitation		Frequency
	Monthly Avg	Daily Max	
	Mg/L (unless stated)		
Flow	Report	Report	1/month
COD	---	125	1/month
Oil and Grease	---	15	1/month
Benzene (*)	---	0.1	1/month
Ethylbenzene (*)	---	0.1	1/month
Toluene (*)	---	0.1	1/month
Total Xylenes (*)	---	0.1	1/month
pH, standard units	6.0	9.0	1/month

(*) Only those which might be present.

Outfall 006 - treated process wastewaters including tank and equipment washwater, contact stormwater from inside dikes, pits, docks, and truck and railroad tracks, vapor recovery condensate from methanol loading, incidental spills and leaks, petroleum contaminated groundwater, and hydrostatic test water (from this location and from the IMTT Gretna and Avondale facilities)

Pollutant	Limitation		Frequency
	Monthly Avg	Daily Max	
	Mg/L (unless stated)		
Flow	Report	Report	1/month
COD	200	300	1/month
TSS	---	45	1/month
Oil and Grease	---	15	1/month
Benzene	---	0.1	1/month
Ethylbenzene	---	0.1	1/month
Toluene	---	0.1	1/month

Total Xylenes	---	0.1	1/month
Total Lead	0.05	0.05	1/month
pH, standard units	6.0	9.0	1/month

Outfall 007 – hydrostatic test water

	Limitation		
	Monthly Avg	Daily Max	
Pollutant	Mg/L (unless stated)		**Frequency**
Flow	Report	Report	1/discharge
TOC	---	50	1/discharge
TSS	---	90	1/discharge
Oil and Grease	---	15	1/discharge
Benzene	---	0.05	1/discharge
Total BTEX	---	0.25	1/discharge
Total Lead	---	0.05	1/discharge
pH, standard units	6.0	9.0	1/discharge

9. ENDANGERED SPECIES

The receiving waterbody, Subsegment 041001 of the Lake Pontchartrain Basin, has been identified by the U.S. Fish and Wildlife Service (FWS) as habitat for the Gulf sturgeon and the West Indian manatee which are listed as threatened species. The receiving waterbody, Subsegment 070301 of the Mississippi River Basin, has been identified by the U. S. Fish and Wildlife Service (FWS) as habitat for the Pallid sturgeon which is listed as a threatened species. Consultation with the Service is required if the proposed permit is in sensitive waters and contains one or more listed substances. The draft permit is in listed sensitive waters and contains monitoring of lead. Therefore, this draft permit has been submitted to the FWS for review in accordance with a letter dated November 17, 2008 from Rieck (FWS) to Nolan (LDEQ). The effluent limitations established in the permit ensure protection of aquatic life and maintenance of the receiving water as aquatic habitat. Therefore, the issuance of the LPDES permit is not likely to have an adverse effect on any endangered or candidate species or the critical habitat.

10. HISTORIC SITES

The discharge is from an existing facility location, which does not include an expansion on undisturbed soils. Therefore, there should be no potential effect to sites or properties on or eligible for listing on the National Register of Historic Places, and in accordance with the "Memorandum of Understanding for the Protection of Historic Properties in Louisiana Regarding LPDES Permits" no consultation with the Louisiana State Historic Preservation Officer is required.

11. TENTATIVE DETERMINATION

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to issue a permit for the discharge described in the application.

12. PUBLIC NOTICES

Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested persons may submit written comments on the draft permit and may request a public hearing to clarify issues involved in the permit decision at this Office's address on the first page of the statement of basis. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.

Public notice published in:

Local newspaper of general circulation

Office of Environmental Services Public Notice Mailing List

Rationale for International - Matex Tank Terminals

1. **Outfall 002** - stormwater runoff from inside dikes of N-series tanks and from maintenance areas, irrigation water from St. Rose Nursery green house washdown, and previously monitored hydrostatic test water

   Outfall 004 - stormwater runoff from inside dikes of the central tank farm and from maintenance areas, irrigation water from St. Rose Nursery green house washdown, and previously monitored hydrostatic test water

   Outfall 008 - stormwater runoff from inside the dikes of the western tank farm, the pipe laydown area, from maintenance areas, and previously monitored hydrostatic test water

   Outfall 009 - stormwater runoff from inside dikes of the far western tank farm and previously monitored hydrostatic test water

Pollutant	Limitation		Reference
	Monthly Avg	Daily Max	
	Mg/L (unless stated)		
Flow	Report	Report	*; previous permit
TOC	---	50	*; previous permit
Oil and Grease	---	15	*; previous permit
Benzene	---	0.1	previous permit; BPJ
Ethylbenzene	---	0.1	previous permit; BPJ
Toluene	---	0.1	previous permit; BPJ
Total Xylenes	---	0.1	previous permit; BPJ
pH, standard units	6.0	9.0	*; previous permit

Treatment: none

Monitoring Frequency: 1/month

Benzene, ethylbenzene, toluene, and total xylenes must be monitored during the monitoring period in which the commodities containing one or more of the specified chemicals are handled and/or stored, and for two monitoring periods thereafter. If the effluent limitation is exceeded during either of these two additional monitoring periods, then monitoring shall continue once per month until the limit is met for two consecutive months at which time monitoring for this parameter shall cease.

Limits Justification: flow, TOC, oil and grease and pH limitations are based on the previous permit and LDEQ's guidance on stormwater*. Monitoring for benzene, ethylbenzene, toluene, and total xylenes is required based on the previous permits and on BPJ because the facility handles commodities that may contain said chemicals. The limits are based on the previous permit and are consistent with current LDEQ practices for permitting stormwater with potential to discharge these types of pollutants.

* LDEQ's guidance on stormwater, letter dated 6/17/87, from J. Dale Givens (LDEQ) to Myron Knudson (EPA Region 6)

2. **Outfall 003** - stormwater runoff from inside the dikes of the eastern tank farm, truck/rail loading and unloading areas, and from maintenance areas, boiler blowdown, condensate, exterior vehicle washwater, treated sanitary wastewater, previously monitored hydrostatic test water, and previously monitored REG facility wastewaters (stormwater runoff, boiler blowdown, cooling tower blowdown, and water softener regeneration waters)

	Limitation		
	Monthly Avg	Daily Max	
Pollutant	Mg/L (unless stated)		**Reference**
Flow	Report	Report	*; previous permit; LAG480000
COD	---	125	*; previous permit; LAG480000
Oil and Grease	---	15	*; previous permit; LAG480000
Benzene	---	0.1	previous permit; BPJ
Ethylbenzene	---	0.1	previous permit; BPJ
Toluene	---	0.1	previous permit; BPJ
Total Xylenes	---	0.1	previous permit; BPJ
pH, standard units	6.0	9.0	*; previous permit;LAG480000

Treatment: oil/water separator; sanitary wastewater is treated through mechanical treatment plants

Monitoring Frequency: 1/month

Benzene, ethylbenzene, toluene, and total xylenes must be monitored during the monitoring period in which the commodities containing one or more of the specified chemicals are handled and/or stored, and for two monitoring periods thereafter. If the effluent limitation is exceeded during either of these two additional monitoring periods, then monitoring shall continue once per month until the limit is met for two consecutive months at which time monitoring for this parameter shall cease.

Limits Justification: flow, oil and grease and pH limitations are based on the previous permit, LDEQ's guidance on stormwater*, and the Light Commercial General Permit, LAG480000 effective August 1, 2001. The COD limitation was based on the previous permit and the Light Commercial General Permit, LAG480000, Schedule B, effective August 1, 2001. Monitoring for benzene, ethylbenzene, toluene, and total xylenes is required based on the previous permit and on BPJ because the facility handles commodities that may contain said chemicals. The limits are based on the previous permit and are consistent with current LDEQ practices for permitting stormwater with potential to discharge these types of pollutants.

The sanitary wastewater is treated in mechanical treatment plants, and is then routed to absorption lines. The absorption lines are designed to allow all of the treated sanitary wastewater to absorb into the ground. However, if the ground is saturated, there is a possibility that a de minimus amount of sanitary wastewater could be discharged. Because the volume of discharge is too low to have a significant impact, typical limitations for sanitary wastewater discharge, BOD, fecal coliform, and TSS, have not been incorporated into the permit.

* LDEQ's guidance on stormwater, letter dated 6/17/87, from J. Dale Givens (LDEQ) to Myron Knudson (EPA Region 6)

3. **Outfall 005** - stormwater runoff from inside dikes of the southern tank farm, inside dikes of the methanol tanks west of Airline Street, and from maintenance areas, treated sanitary wastewater, and previously monitored hydrostatic test water

Pollutant	Limitation		Reference
	Monthly Avg	Daily Max	
	Mg/L (unless stated)		
Flow	Report	Report	*; previous permit
TOC	---	50	*; previous permit
Oil and Grease	---	15	*; previous permit
Benzene	---	0.1	previous permit; BPJ
Ethylbenzene	---	0.1	previous permit; BPJ
Toluene	---	0.1	previous permit; BPJ
Total Xylenes	---	0.1	previous permit; BPJ
pH, standard units	6.0	9.0	*; previous permit

Treatment: sanitary wastewater is treated through mechanical treatment plants

Monitoring Frequency: 1/month

Benzene, benzene, ethylbenzene, toluene, and total xylenes must be monitored during the monitoring period in which the commodities containing one or more of the specified chemicals are handled and/or stored, and for two monitoring periods thereafter. If the effluent limitation is exceeded during either of these two additional monitoring periods, then monitoring shall continue once per month until the limit is met for two consecutive months at which time monitoring for this parameter shall cease.

Limits Justification: flow, TOC, oil and grease and pH limitations are based on the previous permit and LDEQ's guidance on stormwater*. Monitoring for benzene, ethylbenzene, toluene, and total xylenes is required based on the previous permit and on BPJ because the facility handles commodities that may contain said chemicals. The limits are based on the previous permit and are consistent with current LDEQ practices for permitting stormwater with potential to discharge these types of pollutants.

The sanitary wastewater is treated in mechanical treatment plants, and is then routed to absorption lines. The absorption lines are designed to allow all of the treated sanitary wastewater to absorb into the ground. However, if the ground is saturated, there is a possibility that a de minimus amount of sanitary wastewater could be discharged. Because the volume of discharge would be too low to have a significant impact, typical limitations for sanitary wastewater discharge, BOD, fecal coliform, and TSS, have not been incorporated into the permit.

* LDEQ's guidance on stormwater, letter dated 6/17/87, from J. Dale Givens (LDEQ) to Myron Knudson (EPA Region 6)

4. **Outfall 006** - treated process wastewaters including tank and equipment washwater, contact stormwater from inside dikes, pits, docks, and truck and rail racks, vapor recovery condensate from methanol loading, scrubber water from vapor recovery unit, incidental spills and leaks, petroleum contaminated groundwater, and hydrostatic test water (from this location and from the IMTT Gretna and Avondale facilities)

	Limitation		
	Monthly Avg	Daily Max	
Pollutant	Mg/L (unless stated)		**Reference**
Flow	Report	Report	previous permit; LAG480000
COD	200	300	previous permit; LAG480000
TSS	---	45	previous permit; LAG480000
Oil and Grease	---	15	previous permit; LAG480000
Benzene	---	0.1	previous permit; BPJ
Ethylbenzene	---	0.1	previous permit; BPJ
Toluene	---	0.1	previous permit; BPJ
Total Xylenes	---	0.1	previous permit; BPJ
Total Lead	0.05	0.05	previous permit; BPJ; LAG940000
pH, standard units	6.0	9.0	previous permit;LAG480000

Treatment: dissolved air flotation, equalization, biological reactor, and sludge digester

Monitoring Frequency: 1/month

Limits Justification: flow, COD, TSS, oil and grease and pH limitations are based on the previous permit and the Light Commercial General Permit, LAG480000, Schedule B, effective August 1, 2001. Monitoring for benzene, ethylbenzene, toluene, and total xylenes is required based on the previous permit and on BPJ because the facility handles commodities that may contain said chemicals. The limits are based on the previous permit and are consistent with current LDEQ practices for permitting stormwater with potential to discharge these types of pollutants. Total Lead limits are based on the previous permit and the general permit for Discharges of Treated Groundwater, Potentially Contaminated Storm Water, and/or Associated Wastewaters, LAG940000, effective January 1, 2006.

This facility is not subject to Effluent Limitations Guidelines for Centralized Waste Treatment, 40 CFR Part 437. 40 CFR 437.2 defines *Centralized waste treatment (CWT) facility* as any facility that treats any hazardous or non-hazardous industrial wastes, hazardous or non-hazardous industrial wastewater, and/or used material received from offsite. In accordance with 40 CFR 437.1.b, this part does not apply to wastewater from the treatment of wastes that are generated off-site if the discharger demonstrates that the offsite wastes are of similar nature and the treatment of such wastes are compatible with the treatment of non-centralized waste treatment (CWT) wastes generated and treated at the CWT. IMTT Gretna and IMTT Avondale handle the same products as the St. Rose facility. The wastewaters from IMTT Gretna and IMTT Avondale are similar in nature to the wastewaters generated at IMTT St. Rose. Therefore, the treatment of such wastewaters should be compatible with the treatment of wastes generated at the St. Rose facility.

5. **Outfall 007** – Hydrostatic Test Water

Pollutant	Limitation		Reference
	Monthly Avg	Daily Max	
	Mg/L (unless stated)		
Flow	Report	Report	previous permit; LAG670000
Oil & Grease	---	15	previous permit; LAG670000
TOC	---	50	previous permit; LAG670000
TSS	---	90	previous permit; LAG670000
Benzene	---	50 µg/l	previous permit; LAG670000
Total Lead	---	50 µg/l	previous permit; LAG670000
BTEX	---	250 µg/l	previous permit; LAG670000
pH, standard units	6.0 (min)	9.0 (max)	previous permit; LAG670000

Treatment: none
Monitoring Frequency: 1/discharge from each tank or vessel being tested.

Limits Justification: Limits and monitoring frequency are based on the previous permit and the Hydrostatic Test General Permit (LAG670000).

BPJ Best Professional Judgement

NOTE
For outfalls containing concentration limits, the usage of concentration limits is based on BPJ for similar outfalls since the flow is variable and estimated.

STORM WATER POLLUTION PREVENTION PLAN (SWP3) REQUIREMENT

A SWP3 is included in the permit because in accordance with LAC 33:IX.2511.A.1, storm water discharges shall not be required to obtain an LPDES permit "... except... discharges associated with industrial activity." In accordance with LAC 33:IX.2511.B.14.h, facilities classified as SIC code 4226 and 5171 are not considered to have storm water discharges associated with industrial activity unless they have "vehicle maintenance shops, equipment cleaning operations, or airport deicing operations." This facility has discharges from equipment cleaning operations.

For first time permit issuance, the SWP3 shall be prepared, implemented, and maintained within six (6) months of the effective date of the final permit. **For renewal permit issuance**, the SWP3 shall be reviewed and updated, if necessary, within six (6) months of the effective date of the final permit. The plan should identify potential sources of storm water pollution and ensure the implementation of practices to prevent and reduce pollutants in storm water discharges associated with industrial activity at the facility (see Narrative Requirements for the AI).